IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA)
v.) Criminal Action No. 1:23-cr-00061-MN
ROBERT HUNTER BIDEN,)
Defendant.)))

DEFENDANT'S MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF HIS MOTION TO COMPEL DISCOVERY AND SET DISCOVERY DEADLINES

Defendant Robert Hunter Biden having moved on January 30, 2024 (DE 83) to compel discovery and set discovery deadlines in this case, and the prosecution having filed an opposition to Mr. Biden's motion on February 13, 2024 (DE 86), Mr. Biden hereby seeks leave of the Court to file a reply in support of his motion to compel discovery within seven (7) days, and no later than February 20, 2024. Mr. Biden's counsel conferred with the prosecution on February 13, 2024, and Mr. Hines indicated that they do not object to this request.

Dated: February 14, 2024 Respectfully submitted,

Bartholomew J. Dalton (#808) DALTON & ASSOCIATES, P.A. 1106 West 10th Street Wilmington, DE 19806 Tel.: (302) 652-2050

Tel.: (302) 652-2050 BDalton@dalton.law Abbe David Lowell Christopher D. Man WINSTON & STRAWN LLP 1901 L Street NW Washington, DC 20036

Tel.: (202) 282-5000 Fax: (202) 282-5100

/s/ Abbe David Lowell

Abbe Lowell Public Outreach@winston.com

CMan@winston.com

Counsel for Robert Hunter Biden

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2024, I filed the foregoing Motion for Leave to File a Reply in support of Mr. Biden's Motion to Compel Discovery with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Abbe David Lowell
Abbe David Lowell

Counsel for Robert Hunter Biden